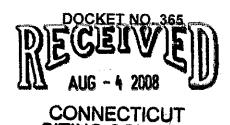
STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF OPTASITE TOWERS LLC AND OMNIPOINT COMMUNICATIONS, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS FACILITY AT 39 MAENNERCHOR AVENUE NORWICH (TAFTVILLE), CONNECTICUT



DARITING COUNCIL

INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL FROM CO-APPLICANT OPTASITE TOWERS LLC

Co-applicant Optasite Towers LLC ("Optasite") submits the following responses to the interrogatories from the Connecticut Siting Council in connection with the above captioned Docket.

- 1. How many of the return receipts for the notices sent to abutting landowners did Optasite receive: If some return receipts were not received, did Optasite make other attempts to notify the landowners? If yes, explain.
- A. Optasite has received return receipts from all abutting landowners as a result of its initial mailing and follow-up second mailing sent on July 28, 2008.
- 2. To what engineering standard would the proposed tower be built? What would be the dimensions of the tower (diameter of tower at base; diameter of tower at top)?
- A. The tower will be designed in accordance with ANSI/TIA-222-G, Structural Standards for Steel Antenna Towers and Antenna Supporting Structures (EIA) in accordance with the International Building Code. The tower will be approximately 44" at the base and 24" at the top based on similar tower designs of similar height. The actual dimensions will be verified upon final tower design.
- 3. Who owns the nearest residence to the proposed facility?
- A. Kevin C. Godaire owns the nearest residence located at 24 Beauregard Street.

- 4. How much cut and fill would be required to develop the proposed site?
- A. Site development will require 236 cubic yards of cut and 122 cubic yards of fill.
- 5. Would any blasting be required to develop the site?
- A. Exposed ledge was visible on the property so it is possible ledge may be encountered during excavation. The presence of ledge will be confirmed upon completion of a geotechnical investigation. If ledge is encountered, chipping is preferred to blasting.
- The application states that Optasite representatives met with the Norwich City Council on August 20, 2008. Should this date be August 20, 2007?
- A. Yes. Optasite met with the Norwich City Council on August 20, 2007.
- 7. What accounts for the seemingly long interval between the date of Optasite's submittal of a technical report to the City of Norwich (June 28, 2007) and its application submittal to the Siting Council (June 11, 2008)?
- A. During the City Council meeting on August 20, 2007, the City of Norwich indicated that it would like Optasite to follow-up on a possible alternate location at Mohegan Park in Norwich. As is its customary practice, Optasite investigated that site. That site was rejected by T-Mobile. In addition, Optasite was continuing to explore the possibility of either co-locating equipment on existing CL&P lines in the area or leasing property from CL&P to construct a new tower. In the first instance, T-Mobile rejected co-location of equipment on the existing transmission lines as those lines were not of sufficient height to fill T-Mobile's coverage gap in this area. Further, Optasite was unable to reach an agreement with CL&P regarding the construction of a new tower on CL&P property. Once these other possible alternatives were exhausted, Optasite proceeded to file this Application.
- 8. Has Optasite received any written correspondence from the Norwich Fire Department indicating its interest in locating antennas on the proposed tower? If so, please provide a copy.
- A. Yes. Please see correspondence attached hereto as Exhibit 1.
- Has Optasite received any written correspondence from AT&T indicating its interest in locating antennas on the proposed tower? If so, please provide a copy.
- A. Yes. Optasite received an application from AT&T, a copy of which is attached hereto as Exhibit 2.

- 10. Would Optasite allow the City of Norwich to place antennas on its proposed tower for no fee, if the City wanted to use the tower?
- A. Yes. As is its customary practice, Optasite has offered the City of Norwich space on the tower, free of charge, for its emergency services equipment. As indicated in response to Interrogatory #8, the Norwich Fire Department has already indicated its desire to locate equipment on the proposed Facility.
- 11. Have any town boards or commissions had any meetings or hearings on these proposed sites? Have any boards or commissions submitted any reports or letters to Optasite regarding its proposal? If so, provide copies of such correspondence.
- A. As stated in response to Interrogatory #6, Optasite met with the Norwich City Council on August 20, 2007. To date, despite its offer to do so, no other City boards or commissions have requested information from Optasite concerning this application.
- 12. Which party originally initiated a search for a site in this area, Optasite or T-Mobile?
- A. T-Mobile initiated the site search in this area of Norwich. When Optasite became involved, Optasite assumed the site search responsibilities.
- 13. When did this site search begin? Where was the site search centered? What was the extent of the search ring? Provide a map, with scale and compass, of search ring.
- A. Optasite began its site search in this area of Norwich in December of 2005.
- 14. What is the address of the Norwich Fire Department, identified as number 11 in Exhibit H? What kind of tower is at this location?
- A. The Norwich Fire Department is located at 444-448 North Main Street. The tower is a rooftop lattice tower. The total height of the building and rooftop tower together is 50 feet.
- 15. Confirm the addresses, latitude and longitude coordinates, tower heights, and types of existing towers of the sites identified as numbers 12 and 13 in Exhibit H.
- A. Site 12 in Exhibit H should be listed as: State of CT, 446 Plain Hill Rd 100' lattice structure, Lat: 41-35-38.01 Long: 72-06-9.87
 - Site 13 in Exhibit H should be listed as: State of CT, 442 Plain Hill Rd 100' monopole, Lat: 41-35-39.42 Long: 72-06-8.57

Of note, Mr. Wisneske owns the property at 444 Plain Hill Rd but not the towers in the vicinity of this location.

Respectfully Submitted Applicant Optasite Towers LLC,

its Attorney
Carrie L. Larson, Esq.
clarson@pullcom.com
Pullman and Comley, LLC
90 State House Square
Hartford, CT 06103-3702
Tel. (860) 424-4312
Fax (860) 424-4370

Certification

This is to certify that a copy of the foregoing has been mailed, this date to all parties and intervenors of record.

Julie Kohler Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604

Carrie L. Larson

Hartford/72517.3/CLARSON/316759v1

EXHIBIT 1

From: Kenneth J Scandariato [mailto:chiefscand@cityofnorwich.org]

Sent: Monday, June 16, 2008 3:42 PM

To: Charles Regulbuto

Cc: Alan Bergren; Chiefscand Subject: Tower placement

Chuck,

Please accept this email as formal notification of the City of Norwich's intent to acquire space on the 120' tower proposed at 39 Maennerchor Ave, Taftville, CT. We have a specific interest in this area that will benefit the public safety communications capabilities.

Please contact my office as you progress for further in the permit process for further details.

Chief Kenneth Scandariato; EFO CFEI

Norwich Fire Department 10 North Thames Street Norwich, CT 06360 860-892-6080 Office 860-608-9665 Cell

EXHIBIT 2

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